

## **OQ Lessons Learned Developed During State / Federal Reset Meeting February 10-13, 2004**

### **Collaborative Resolution of Regulatory Issues**

- To be productive, public meetings such as those held in the winter and early spring of 2003 to clarify/resolve OQ issues must:
  - Have a tightly defined agenda and be very focused;
  - Be controlled to prevent participants with parochial issues from dominating or diverting discussions. (No presentations should be allowed unless pre-approved based on access to material).
- If the purpose of a joint meeting with the industry is to clarify/resolve issues, clear leadership of both the regulators and industry contingents is critical to success. Leadership of such efforts is a significant challenge.
- If public meetings are identified as the mechanism for addressing a set of issues, the meetings need to be designed to focus on clarification and resolution of the key issues. Public meetings have the potential to stray far off the designated path.
- Public meetings are generally very difficult settings in which to *resolve issues*. Such meetings can be effectively used to *identify issues*, to *pose questions*, or to *clarify the perspective* of various interest groups on identified issues. Issue resolution needs to be accomplished by regulators working together. Once positions exist on issues, candidate resolution approaches can be aired in a public forum.

### **Communication among Regulators**

- When regulators and industry meet to develop standards or to clarify/resolve issues (such as in the public meetings on OQ held in the winter of 2003), *meetings among the regulators in advance of the interactions with the industry are critical to development of clear and consistent regulatory positions*. Meetings among regulators following the industry interactions to debrief on meeting outcome are also very useful. (Note, the REGNEG Process would have worked much better if such meetings had been held. The effort to develop an approach to Distribution IMP is using conference calls and regulator-only interim meetings to accomplish this preparation.)
- Using a joint state/federal team to support industry interactions is very valuable in developing consistent regulatory positions that accommodate the needs of all parties.
- A time line of events (both past and future) is a useful tool to communicate expectations as well as to clarify the length of time needed to complete the effort and the reasons for the time requirement.
- Effective mechanisms are needed to communicate between those who attend meetings and those they represent. Potentially useful mechanisms include:
  - Developing and maintaining a listing of FAQs and responses;

- Brief meeting summaries designed to communicate with busy managers;
  - Web sites where supporting information is available for those who want/need the details (NAPSR is currently developing such a web site).
  - Means to track action items and persons responsible for action items.
- Regulators participating on B31Q need to strongly encourage other regulators to comment on the draft version of the standard during the public comment period. There is a need to establish responsibility of all parties to communicate happenings of all meetings...states are waiting on regions...NAPSR is waiting on team members...Feds are waiting on Federal partners to report to RDs...and RDs are waiting on team leaders advise of next move. A communication tree needs to be developed showing the flow/dissemination of information.

### **Promoting Inspection Consistency**

- The computer-based training (CBT) module was viewed by all as an effective means to expedite training of inspectors. The testing contained within the CBT module was viewed as sufficiently challenging to evaluate inspector readiness. (OPS should investigate how to make the CBT available to industry at lower cost – they, as well as the regulatory community, would benefit from easy access to this material.)
- The states are very positive on the use of the electronic (MS Word) inspection form coupled to an inspection database. This should facilitate capturing needed inspection notes and communicating useful inspection results among regulators (once OPS and individual states have clarified the needed constraints on the amount of enforcement material that can be shared, if any).
- Some states expressed the desire to be able to export inspection results from (and import to) other existing state-specific inspection databases (e.g., Excell).
- The on-the-job training (OJT) offered by the core team to both state and federal inspectors was well subscribed and viewed as very useful by the states.

### **Industry Implementation Effectiveness and Concerns**

- The size of operators seems to impact their attitude toward OQ. The largest operators typically focus on attaining minimal compliance, the medium sized operators typically seek the best solution to achieve what they believe to be the objectives of OQ, and the smallest operators (e.g., Master Meters and LP operators) are typically clueless.
- Operators choosing work performance history review as the basis for qualifying long-term staff have often treated documentation needs superficially and ignored the need to train and qualify individuals on abnormal operating conditions (AOCs).
- Operators are often slow to recognize that they can (and should) make use of existing management systems (e.g., change management, trouble tickets, service

orders, work authorizations, foremen's time, project completion reports) to satisfy OQ requirements.

- Often the connection between headquarters programs and field implementation of the programs has been observed to be very weak. Programs containing both weak headquarters/strong field and strong headquarters/weak field implementation have been observed.
- Often there are significant differences between task definition among operators and between operators and contractors. This complicates portability of qualifications.
- Various operators relying on the same consortium usually have common program weaknesses. These weaknesses are often addressed quickly and consistently once recognized.

### **Remaining Problem Areas**

- Better approaches to expedite transfer of contractor qualifications (portability) among operators would be very useful to both operators and contractors.
- Documentation to support interacting with the smallest operators to help them understand OQ requirements and how to meet the requirements has been developed (small operator guidance and example program description). This documentation needs to be disseminated and explained to small operators and its use promoted.
- Incorporation of all stakeholders in some manner:
  - Unions
  - Contractors
  - Associations
  - Operators
    - Large
    - Small
    - Gas
    - Liquid
  - Government
    - Local
    - State
    - Federal
  - Consultants
  - Vendors